

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re:

NATIONAL BROKERS OF AMERICA, Chapter 7
INC.

Debtor. Bankruptcy No. 19-15488-pmm

CERTIFICATION OF FEES INCURRED BY INTERVENOR ALAN C. REDMOND

I, David P. Heim, Esquire, hereby certify to the following:

1. I am a licensed attorney in the Commonwealth of Pennsylvania and a partner at the law firm of Bochetto & Lentz, P.C.
2. I represent Intervenor Alan C. Redmond in this matter. I am submitting this Certification of Fees at the direction of the Court during the July 2, 2024 hearing on the Debtor's Motion for Enforcement of the Automatic Stay [ECF # 179].
3. Mr. Redmond is responsible for the payment for legal fees necessary to file and prosecute the Debtor's Motion to Enforce Automatic Stay ("Motion to Enforce") as well as the fees for his Motion to Intervene concerning that Motion.
4. Mr. Redmond is also responsible for the payment of the legal fees necessary to defend against Jason Jordan's Berks County Action, filed in 2022, against Bene Market LLC and Mr. Redmond, Berks County Civil Docket 22-11757, which, as stated in the Motion to Enforce, and during the July 2, 2023 hearing, was filed in violation of this Court's automatic stay.
5. The fees incurred in connection with the Motion to Enforce, the Motion to Intervene, and to defend Mr. Jordan's Berks County Action, Civil Docket 22-11757, are compensable based on Mr. Jordan's and his counsel's violation of the automatic stay.
6. A copy of the Docket in Mr. Jordan's Berks County Action is attached hereto as Exhibit "A."

7. A review of the Berks County Docket reveals the action was filed in July 2022 and since that time approximately 70 court filings were docketed, including Preliminary Objections, a hearing on those preliminary objections, an initial Petition for Receiver, a hearing on that Petition for Receiver, a renewed Petition for Receiver, and a hearing on that renewed Petition for Receiver.
8. Mr. Jordan further propounded written discovery in the Berks County Action, which required responses and production of documents.
9. The Final Pre-trial Conference for Mr. Jordan's Berks County Action is scheduled for July 12, 2024.
10. In continued willful violation of the automatic stay, and despite this Court's admonitions that the Berks County Action is in violation of the automatic stay, Mr. Jordan and his counsel continue to litigate that action, having filed a Pre-trial Memorandum as recently as July 9, 2024, a copy of which is attached as Exhibit "B."
11. I performed legal work for Mr. Redmond in both Mr. Jordan's Berks County Action and in this matter in connection with Mr. Redmond's Motion to Intervene and the Motion to Enforce.
12. My hourly rate in 2023 – when I performed legal work for Mr. Redmond in defense of Mr. Jordan's claims in the Berks County matter – was \$495. My hourly rate was increased in 2024 to \$525 for all client matters, including Mr. Redmond's.
13. I have been a licensed attorney in the Commonwealth for over twenty-four (24) years since November 1999. I am a partner at the law firm Bochetto & Lentz, P.C. My practice is dedicated to litigation matters. I concentrate on litigating complex commercial litigation matters. I have appeared in state, federal and bankruptcy courts around the Country.
14. A copy of my firm's detailed time records for the work I and other members of my firm performed for Mr. Redmond in Mr. Jordan's Berks County Action and in this matter is attached as Exhibit "C."
15. I and other members of my firm spent a total of 31.95 hours in connection with Mr. Jordan's Berks County Action and this matter. The total attorney's fees incurred in this regard was \$16,584.75. See Ex. C.
16. Aside from myself and my firm, the other attorneys who performed legal services in connection with the Motion to Enforce and to defend Mr. Jordan's Berks County Action, Civil Docket 22-11757 are: Norman Valz, Esquire, Eric Reed, Esquire, William Rush, Esquire, and Osmer Deming, Esquire.

17. Mr. Valz was counsel of record for Mr. Redmond and Bene Market in Mr. Jordan's Berks County matter. He also is counsel of record for the Debtor in this matter.
18. Mr. Valz has been a licensed attorney in the Commonwealth for thirty-three (33) years since 1991. Mr. Valz's detailed time records are attached hereto as Exhibit "D."
19. Mr. Valz's payment arrangements are that he is paid a flat rate on a bi-weekly basis for thirty hours of billable work, which amounts to an hourly rate of \$ 183.33. He spent a total of 99.5 hours defending against Mr. Jordan's claims in the Berks County Action and filing and prosecuting the Debtor's Motion to Enforce in this matter. Mr. Valz's total attorney fees incurred in defending Mr. Jordan's Berks County Action and prosecuting the Motion to Enforce are \$18,205, which is reflected in his detailed billing records attached as Ex. D.
20. Mr. Reed represented Mr. Redmond and Bene Market LLC in Mr. Jordan's Berks County Matter. Mr. Reed was at the time of his representation a partner in the law firm of Fox Rothschild LLP in the firm's commercial litigation department. Mr. Reed has been a licensed attorney in the Commonwealth for 18 years since 2006.
21. Mr. Reed's detailed time records are attached hereto as Exhibit "E." His hourly rate was \$695. He was assisted by an associate, Stephanie Ohnona, whose hourly rate was \$410. Fox Rothschild's total attorney fees incurred in defending Mr. Jordan's Berks County Action was \$44,929.93.
22. Mr. Rush represents Mr. Redmond and the Debtor and was the primary researcher and draftsman for the Motion to Enforce. Mr. Rush has been a licensed attorney in the Commonwealth for over thirteen (13) years since 2008.
23. Mr. Rush's detailed time records are attached hereto as Exhibit "F." His hourly rate is \$400. He spent a total of 35.9 hours researching and drafting the Motion to Enforce. Mr. Rush's total attorney fees incurred in researching and drafting the Motion to Enforce was \$14,360.
24. Mr. Deming represents the Debtor in this action and entered his appearance in this matter on July 1, 2024.
25. Mr. Deming has experience in complex commercial litigation matters, including bankruptcy matters. Mr. Deming attended the July 2, 2024 hearing. Mr. Deming has been a licensed attorney in the Commonwealth for twenty-four (24) years since 2000.

26. Mr. Deming's detailed time records are attached hereto as Exhibit "G." His hourly rate is \$250/hour. He spent a total of 4.6 hours reviewing the Motion to Enforce and bankruptcy docket and attending the July 2, 2024 hearing. Mr. Deming's total attorney fees incurred was \$1,150.

27. Based on the foregoing, the total attorney fees incurred in defending Mr. Jordan's Berks County Action and prosecuting the Motion to Enforce are as follows:

- Bochetto & Lentz: \$16,584.75
- Norm Valz: \$18,205
- Fox Rothschild/Eric Reed: \$44,929.93
- William Rush: \$14,360
- Osmer Deming: \$1,150

Total Fees: \$95,228.93

28. The above attorney fees were reasonable and necessary to defend Mr. Jordan's Berks County Action – filed in violation of the automatic stay – and to draft, research, file and prosecute the Motion to Enforce.

29. The attorney's rates set forth above are reasonable and consistent with market rates according to each attorney's experience, the level of expertise, and the nature of the engagement.

30. Mr. Redmond as the responsible party for the foregoing attorney fees respectfully requests that the Court enter an Order directing respondents Jason Jordan and his counsel, Joel Ready, Esquire, and law firm Cornerstone Law Firm, jointly and severally, to pay same to Mr. Redmond's counsel, David P. Heim, Esquire, within twenty (20) days based on the willful and continuing violation of this Court's automatic stay.

Dated: July 10, 2024

/s/ David P. Heim

David P. Heim, Esquire

CERTIFICATE OF SERVICE

I, *David P. Heim, Esquire*, hereby certify that a true and correct copy of the forgoing was filed electronically through this Court's ECF System and is available for viewing and downloading from this Court's ECF System for all parties of record. I further certify that an electronic copy of the foregoing was served upon the following through this Court's ECF System and via email:

Joel A. Ready, Esquire
CORNERSTONE LAW FIRM
8500 Allentown Pike, Suite 3
Blandon, PA 19510
joel@cornerstonelaw.us
Counsel for Jason Scott Jordan

BOCHETTO & LENTZ, P.C.

Dated: July 10, 2024

By: /s/ David P. Heim, Esquire
DAVID P. HEIM, ESQUIRE

Exhibit “A”

Judge: James E. Gavin, J.
SubType: Complaint

Filed: 07/28/2022

JORDAN, JASON SCOTT

*** VS ***

BENE MARKET LLC

REDMOND, ALAN CHRISTOPHER, INDIVIDUALLY

DBA LEAD HOUSE (THE)

MILLER, STEPHANIE

Eliminated by Stipulation

Attorney(s)

Ready, Joel A

Valz, Norman M

Valz, Norman M

Valz, Norman M

Date	Summary
07/28/2022	Miscellaneous - Other
08/16/2022	Sheriff's Service of Complaint and notice upon Alan Christopher Redmond by handing to Shannon Kroemmelbein/apic on 8/8/22; Sheriff's Service of requested Complaint and notice upon Stephanie Miller, personally on 8/10/22 by deputizing the Sheriff of Adams County; No Sheriff's Service of requested Complaint and notice upon Bene Market LLC on 8/11/22
08/29/2022	Notice to Plead, Preliminary Objections of Defts to Pltf's Complaint w/ Cert of Service
08/29/2022	Proposed Order re: PO's
08/29/2022	Deft's Memorandum of Law in Support of its Preliminary Objections to Pltf's Complaint
08/30/2022	Memo to Judge Sprecher dated 8/30/22 regarding Dismissing PO's
09/06/2022	Appearance of Norman Mount Valz, Esq for Defts w/ Cert of Service
09/09/2022	Order of 9/8/22 RE: PO's Missing Documents. Rule 236 notice and copies provided on 9/9/22
09/12/2022	Appearance of Eric E. Reed, Esq. as counsel for Defts w/ Cert of Service
09/13/2022	Proposed Order w/ Cert of Service
09/22/2022	Praecipe for Argument on 10/17/22 RE: Preliminary Objections w/ Cert of Service
10/04/2022	Proposed Order w/ Cert of Service
10/04/2022	Praecipe for Argument for 11/7/22 RE: PO's w/ Cert of Service
10/07/2022	Order of 10/4/22 RE: PO's. Rule 236 notice and copies provided on 10/7/22
10/07/2022	Order of 10/7/22. Argument continued to 11/7/22. Rule 236 notice and copies provided on 10/7/22
10/20/2022	Order of 10/20/22. Argument continued to 11/30/22. Rule 236 notice and copies provided on 10/20/22
11/02/2022	Pltf's Answer to Deft's Preliminary Objections
11/02/2022	Pltf's Brief in Oppostition to Deft's Preliminary Objections
11/02/2022	Exhibit A
11/02/2022	Certificate of Service of Pltf's Answer to Deft's Preliminary Objections, Pltf's Brief in Oppostition to Preliminary Objections, Exhibits and cert of service
12/01/2022	Order of 11/30/22. Argument continued to 1/17/23. Rule 236 notice and copies provided on 12/1/22
01/13/2023	Stipulation w/ Proposed Order
01/18/2023	Order and Stipulation of 01/17/2023 upon Agreement that Deft. Stephanie Miller is dismissed as a party deft. without prejudice. Deft's must plead over to the Complaint within 20 days of this Stipulation. See Order for additional details. Rule 236 Notice and Copies provided on 01/18/2023.
02/07/2023	Defts Bene Market LLC and Alan Christopher Redmond's Answer and new matter to complaint w/ cert of service
02/09/2023	Pltf's Petition for a Temporary Receiver
02/09/2023	Exhibits(A&B)
02/09/2023	Proposed Order

02/09/2023 Certificate of Service of Pltf's Petition for Temporary Receiver, Proposed Order and Exhibits via email on 02/09/23

02/14/2023 Order of 02/13/23. Rule Returnable and hearing are scheduled Pltf's petition for Appointment of a Temporary Receiver on 03/08/23. Rule 236 notice and copies provided on 02/14/23.

02/14/2023 Order of 02/13/23, Rule Returnable and hearing are scheduled Pltf's petition for appointment of a temporary Receiver on 03/08/23. Rule 236 notice and copies provided on 02/14/23.

02/27/2023 Order of 2/24/23 Continuing Hearing from 3/8/23 to 3/13/23. Rule 236 Notice and Copies Provided on 2/27/23

03/09/2023 Defts' Opposition to pltf's motion for receiver

03/09/2023 Defts' Brief in opposition to pltf's motion for receiver

03/09/2023 Certificate of Service of Answer and new matter

03/09/2023 Proposed Order

03/15/2023 Order of 3/13/23. Hearing continued to 4/21/23. Rule 236 notice and copies provided on 3/15/23

03/21/2023 Pltf's Reply brief in support of petition for a temporary receiver

03/21/2023 Certificate of Service of Pltf's Reply brief in support of petition for a temporary receiver and Cert of service

04/19/2023 Notice to Attend and to Produce

04/19/2023 Certificate of Service of Notice to Attend and to Produce and cert of service

04/24/2023 Order of 4/21/23. Hearing continued to 5/17/23. Rule 236 notice and copies provided on 4/25/23

05/15/2023 Defts' Supplemental Brief in Opposition to Pltf's Motion for Receiver w/ Cert of Service

05/15/2023 Exhibit A

05/15/2023 Defts' Affidavit of John Sardella

05/22/2023 Pltf's Supplemental Brief in Support of Petition for a Temporary Receiver

05/22/2023 Certificate of Service of Pltf's Supplemental Brief in Support of Petition for a Temporary Receiver

05/31/2023 Defts' Response to Pltf's Supplemental Brief Regarding the Appointment of a Receiver w/ Cert of Service

06/08/2023 Order of 6/7/23 Granting Pltf's Petition for Appointment of a Temporary Receiver. Rule 236 Notice and Copies Provided on 6/8/23

06/16/2023 Proposed Transcription Order for 5/17/23 Proceedings

06/19/2023 Order of 6/16/23 Vacating Order 6/7/23. Rule 236 Notice and Copies Provided on 6/19/23

06/19/2023 ADMINISTRATIVE ORDER of June 9, 2023 REASSIGNING this action from Judge Jeffrey K. Sprecher to Judge J. Benjamin Nevius. Original order filed to #23-303.

06/22/2023 Order of 6/21/23 Authorizing Transcription for 5/17/23 Proceedings. Rule 236 Notice and Copies Provided on 6/22/23. Copy sent to Kim Hollinger Court Reporter on 6/22/23

07/03/2023 Transcription for hearing on 05/17/23 - Filed

08/17/2023 Withdrawal of Appearance of Eric E. Reed, Esq. for Defts w/Cert of Service

10/23/2023 Pltf's Renewed Petition for a Temporary Receiver

10/23/2023 Certificate of Service of Pltf's Renewed Petition for a Temporary Receiver

11/06/2023 Order of 11/03/23 Case reassigned to Judge, James E. Gavin. Rule 236 notice and copies provided on 11/06/23.

11/09/2023 Order of 11/8/23 Scheduling hearing on 12/7/23 RE: Pltf's Renewed Petition for a Temporary Receiver. Rule 236 Notice and Copies Provided on 11/9/23

11/09/2023 Proposed Order

11/09/2023 Defts' Opposition to Pltf's Motion for Receiver

11/09/2023 Defts' Brief in Opposition to Pltf's Motion for Receiver

11/09/2023 Exhibit 1

11/09/2023 Exhibit 2

11/09/2023 Affidavit of Verification

11/09/2023 Certificate of Service of Answer and New Matter

12/11/2023 Initial Pre-trial Scheduling Order of 12/8/23. Final Pre-trial Conference on 7/12/24. Rule 236 Notice and Copies Provided on 12/11/23

12/11/2023 Order of 12/8/23 Denying Pltf's Renewed Petition for a Temporary Receiver. Rule 236 Notice and Copies Provided on 12/11/23

Exhibit “B”

CORNERSTONE LAW FIRM, LLC

Joel A. Ready, Esq.
PA Attorney I.D. # 321966
8500 Allentown Pike, Suite 3
Blandon, PA 19530
(610) 926-7875
(484) 930-0054 *fax*
Counsel for Plaintiff

JASON SCOTT JORDAN, Plaintiff, v. BENE MARKET, LLC, ALAN CHRISTOPHER REDMOND, individually and doing business as “The Lead House,” and STEPHANIE MILLER, Defendants.	COURT OF COMMON PLEAS OF BERKS COUNTY, PENNSYLVANIA CIVIL ACTION DOCKET NO.: 22-11757
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PRETRIAL MEMORANDUM

I. Summary Statement of the Facts

Plaintiff and Mr. Redmond were parties to a prior action over a claim by Plaintiff that he was “frozen out” of the business National Brokers of America that he helped to make profitable. The case involved the freeze-out as well as many other substantial breaches of fiduciary duty, where Redmond was misappropriating partnership assets for luxury personal expenses.

Redmond then formed the successor company “Bene Market” using NBOA’s revenue, assets, employees, and clientele. Therefore, all the resources that should rightfully pass to Plaintiff have been hidden and sheltered in Bene Market by Redmond. This means all the Defendants (except Stephanie Miller, who has been dismissed as a party) have been unjustly enriched by the receipt of value that should be passing to Plaintiff as a result of the prior action.

II. Amendments to Pleadings.

None at this time but see the final section of this document. Defendants have sought a change to this action in the Bankruptcy Court for the Eastern District of Pennsylvania.

III. Admissions to Pleadings.

Defendants admits Redmond is a member of Bene Market.

Defendants admit there is a judgment against Redmond resulting from a prior action.

IV. Admissions in Discovery:

None.

V. Itemized Special Damages.

No itemized damages are claimed.

VI. General Unliquidated Damages.

Restitution damages for Plaintiff's proportionate share of the fair market value of Bene Market, LLC, plus its profits and appreciation, together with prejudgment and post-judgment interest.

VII. Stipulations Desired

Stipulate the verdict and judgment in the prior action were entered in the trial court. Stipulate Redmond is a member and/or manager of Bene Market, LLC. Stipulate Bene Market, LLC is in the business of direct-to-consumer marketing of insurance products for insurance carriers.

VIII. Objections to Depositions Taken Specifically for Use at Trial.

None at this time.

IX. Witnesses Expected to be Called.

- Plaintiff;
- Alan Redmond;

- John Sardella;
- Bene Market's accountants C. Malcolm Smith and John Sardella;
- Any employee, officer, member, and/or owner of Bene Market who may be identified; and
- All witnesses called by Defendants as by cross-examination, rebuttal, and impeachment.

X. Exhibits Expected to be Offered into Evidence.

- Decision and Verdict in the prior action;
- Indexed judgment in the prior action against Mr. Redmond;
- Tax documents concerning Bene Market, LLC, including but not limited to IRS "Form 1065" and Pennsylvania "PA-20S/PA-65" returns; and
- Documents concerning the market rate for services like Bene Market's offered to insurance carriers; and
- Insurance documents for Bene Market, LLC.

XI. Legal Issues Anticipated.

- Whether *res judicata* and/or collateral estoppel bar Defendants from challenging the decision and verdict in the prior action;
- Whether Defendant Redmond has been unjustly enriched by assets misappropriated by Redmond in the foundation of Bene Market, LLC; and
- Whether Plaintiff is entitled to pierce the corporate veil.

XII. Special Problems.

A third party corporation, National Brokers of America, along with Defendant Alan Redmond have asked the Bankruptcy Court for the Eastern District of Pennsylvania

to sanction undersigned counsel for this lawsuit. That motion is still pending in
Bankruptcy No. 19-15488-pmm.

Respectfully submitted,

CORNERSTONE LAW FIRM

Date: July 9, 2024

By: 

Joel A. Ready, Esq.

PA Attorney I.D. # 321966

Counsel for Plaintiff

Exhibit “C”

Redmond -- Bene Market

9320.24003

Total
\$16,584.75
31.95 hours

DATE:	ACTIVITY:	DURATION:	DESCRIPTION:	RATE/HR:	TOTAL:	USER:
July 3, 2024	Conference Client	0.3	Review fee application issues with Alan	\$525.00	\$157.50	David Heim
July 2, 2024	Travel/Return	1.2	Travel from Reading hearing to office	\$525.00	\$630.00	David Heim
July 2, 2024	Conference Client	0.5	Call with client re proceedings/hearing	\$525.00	\$262.50	David Heim
July 2, 2024	Court Proceeding	2	Attend hearing bktcy in Reading re motion to enforce automatic stay	\$525.00	\$1,050.00	David Heim
July 2, 2024	Analyze & Review	0.8	Review bktcy pleadings, review Berks County pleading and Complaint against Bene	\$525.00	\$420.00	David Heim
July 2, 2024	Travel/Return	1	Travel to Reading Bktcy Courthouse	\$525.00	\$525.00	David Heim
July 1, 2024	Preparing for Court Appearance	1.4	analyze bktcy case law and pleadings in bktcy ct in prep for hearing, call w/Valz and Osmer Demerling re hearing and prep	\$525.00	\$735.00	David Heim
June 28, 2024	Analyze & Review	1.1	Review pleadings in bktcy	\$525.00	\$577.50	David Heim
June 27, 2024	Analyze & Review	1.5	Review draft motion to intervene, revise same, finalize for filing, fwd to staff motion to intervene for filing w/exhibits, update client and co-counsel, review bktcy case law about automatic stays from EDPA sent by Deming	\$525.00	\$787.50	David Heim
June 27, 2024	Analyze & Review	0.4	Review draft answer to motion for continuance, revise same, send to Valz for filing, update client	\$525.00	\$210.00	David Heim
June 25, 2024	Conference	0.4	Conf. w/client, Norm and Osmer on bktcy petition issues, upcoming hearing, coordinate roles of counsel	\$525.00	\$210.00	David Heim
June 25, 2024	Draft	1.8	Drafting motion to intervene / Redmond / bankruptcy	\$475.00	\$855.00	John O'Connell
June 18, 2024	Analyze & Review	0.9	Review Jordan pleadings, review research on motion to correct Berks County judgment, fwd to team	\$525.00	\$472.50	David Heim
May 24, 2024	Conference	0.8	Call with client, call with Norm, finalize Bktcy Motion, confirm filing	\$525.00	\$420.00	David Heim
May 24, 2024	Analyze & Review	0.5	Review bktcy issues with GB and then call Alan, confirm	\$525.00	\$262.50	David Heim
May 23, 2024	Analyze & Review	0.5	Review draft bktcy petition for Norm	\$525.00	\$262.50	David Heim
May 21, 2024	Analyze & Review	1	Review and revise and comment on Rush bktcy petition	\$525.00	\$525.00	David Heim
May 21, 2024	Conference	1	Zoom legal call on bktcy petition	\$525.00	\$525.00	David Heim
May 20, 2024	Analyze & Review	0.3	Review Rush draft bktcy petition on stay violations	\$525.00	\$157.50	David Heim
May 20, 2024	Conference Client	0.3	Call with client on Jordan, Bktcy issues	\$525.00	\$157.50	David Heim
May 14, 2024	Conference Client	0.5	Call w client and legal team on Jordan case, Bktcy, Dissolution	\$525.00	\$262.50	David Heim
May 14, 2024	Analyze & Review	0.65	Conf call w Alan, Bill, Norm, and DH on Jordan debt-alternative approaches to vacating, defeating, etc.	\$825.00	\$536.25	George Bochetto

[illegible]

Exhibit “D”

Billable Hourly Jason Jordan

Date	Task	Hours	Paid
8/16/2022	Complaint Served, review Pleading, Call Reed	2.7	
8/22/2022	Discuss Strategy	1.6	
8/23/2022	Research PO's	2.4	
8/26/2022	Assist in Draft PO's	4.2	
8/29/2022	PO's Filed	2.2	
11/2/2022	Studey Jordan Response, Call Reed, etc.	2.7	
1/15/2023	Prep. Oral Arg. Hearing PO's	4.3	
1/17/2023	Argument before Sprecher,	3.2	
2/6/2023	Assist Draft Answer and NM	2.2	
2/7/2023	Answer NM	0.8	
2/9/2023	Jordan Motion for Receiver filed, Study, call co-cou	2.6	
3/5/2023	Resp. in Oppo. To Receiver - Research	3.1	
3/7/2023	Resp. in Oppo. To Receiver - Res., Telep. Conf. Dra	2.4	
3/9/2023	Resp. in Oppo. To Receiver - Draft. Call	2.7	
3/11/2023	Jordan Written Discovery	2.3	
4/7/2023	Jordan Draft Resp.	3.1	
3/21/2023	Study Jordan Reply Brief	1.8	
5/14/2023	Talk Sardella, Affidavit regarding Bene	2.3	
5/15/2023	Sardella Affid. Suppl. Brief Draft / File	3.2	
5/17/2023	Hearing Receiver - Prep	4.5	
5/18/2023	Resp to Jordan Suppl Brief	2.7	
5/29/2023	Draft Resp to Jordan Suppl Brief	2.5	
6/8/2023	Conf. Order	1.6	
6/9/2023	Order Transcript	0.3	
6/19/2023	Study New Order	2.3	
10/23/2023	2nd Jordan Motion for Receiver -call/conf.	1.8	
11/8/2023	Draft, Conf. Response to 2nd Motion	3.5	
11/9/2023	Draft, file response 2nd Motion	1.8	
12/7/2023	Attend Hearing fo r2nd Motion	4.3	
12/11/2023	Report on Judge Gavin Order	0.3	
	Hours for Bene Market defense	75.4	

BANKRUPTCY MOTION TO ENFORCE AUTO STAY

5/15/2024	Research Revise, Draft Motion	3.4
5/17/2023	Research Revise, Draft Motion	4.6
5/18/2023	Research Revise, Draft Motion	3.2
5/22/2024	Research Revise, Draft Motion	2.8
5/24/2024	File Motion	0.8

6/4/2024	Revise Notice	0.3
6/17/2024	Receive Cross- Motion - Review and Conf.	2.2
6/27/2024	Motion Continue Hearing, Response	2.3
7/1/2024	Response to Cross Motion	2.6
7/2/2024	Hearing	1.9
	Hours for Bankruptcy Motion	24.1
	Total Hours for Bene Mkt Def and Bkcty	99.5

Norman Valz receives compensation on a hybrid hourly/flat rate basis. He is compensated every
The calculation of money spent on the above-given time spent on the Jordan vs. Bene Mkt. case (ar
\$18,205.00 in compensation previously paid to Mr. Valz for work on the Jordan vs. Bene Mkt. case ;

nd the Motion at hand) is 3.31 x the work for his usual pay period. This equals

Exhibit “E”

Invoice #	Matter #	Tran Type	Inv Date	Pay Date	Drawn By	Total	Fees	Hard Costs	Soft Costs
3230654	185418.00008	Bill	8/7/2023			\$120.50	\$0.00	\$120.50	\$0.00
Invoice 3230654 Total:						\$120.50	\$0.00	\$120.50	\$0.00
3207557	185418.00008	Bill	7/6/2023			\$2,894.91	\$2,567.00	\$327.91	\$0.00
Invoice 3207557 Total:						\$2,894.91	\$2,567.00	\$327.91	\$0.00
3190581	185418.00008	Bill	6/6/2023			\$10,864.79	\$10,772.50	\$92.29	\$0.00
Invoice 3190581 Total:						\$10,864.79	\$10,772.50	\$92.29	\$0.00
3176138	185418.00008	Bill	5/8/2023			\$13,087.28	\$13,077.00	\$10.28	\$0.00
Invoice 3176138 Total:						\$13,087.28	\$13,077.00	\$10.28	\$0.00
3167168	185418.00008	Bill	4/20/2023			\$8,371.45	\$8,270.50	\$100.95	\$0.00
Invoice 3167168 Total:						\$8,371.45	\$8,270.50	\$100.95	\$0.00
3145864	185418.00008	Bill	3/8/2023			\$5,907.50	\$5,907.50	\$0.00	\$0.00
Invoice 3145864 Total:						\$5,907.50	\$5,907.50	\$0.00	\$0.00
3124394	185418.00008	Bill	2/7/2023			\$3,683.50	\$3,683.50	\$0.00	\$0.00
Invoice 3124394 Total:						\$3,683.50	\$3,683.50	\$0.00	\$0.00
3102115	185418.00008	Bill	1/6/2023			\$390.20	\$329.50	\$60.70	\$0.00
Invoice 3102115 Total:						\$0.00	\$0.00	\$0.00	\$0.00
3092203	185418.00008	Bill	12/9/2022			\$6,688.00	\$6,672.00	\$16.00	\$0.00
Invoice 3092203 Total:						\$0.00	\$0.00	\$0.00	\$0.00
3071579	185418.00008	Bill	11/10/2022			\$155.00	\$139.00	\$16.00	\$0.00
Invoice 3071579 Total:						\$0.00	\$0.00	\$0.00	\$0.00
3050292	185418.00008	Bill	10/12/2022			\$1,876.50	\$1,876.50	\$0.00	\$0.00
Invoice 3050292 Total:						\$0.00	\$0.00	\$0.00	\$0.00
3028960	185418.00008	Bill	9/7/2022			\$3,035.50	\$3,035.50	\$0.00	\$0.00
Invoice 3028960 Total:						\$0.00	\$0.00	\$0.00	\$0.00
185418.00008 Matter Total:						\$44,929.93	\$44,278.00	\$651.93	\$0.00



Fox Rothschild LLP
ATTORNEYS AT LAW

2000 Market Street, 20th Floor Philadelphia, PA 19103-3222
Tel 215.299.2000 Fax 215.299.2150 www.foxrothschild.com

ALAN REDMOND
2 HIGH ROAD
WYOMISSING, PA 19610
alanredmond23@gmail.com

Invoice Number 3028960
Invoice Date 09/07/22
Client Number 185418
Matter Number 00008

RE: JORDAN V. BENE MARKET LLC

FOR PROFESSIONAL SERVICES RENDERED THROUGH 08/31/22:

Date	Timekeeper	Description	Hours	Amount
08/24/22	OHNONA	COMPLETE PRELIMINARY OBJECTIONS	4.4	\$1,804.00
08/29/22	OHNONA	FINALIZE PRELIMINARY OBJECTIONS	0.8	\$328.00
08/29/22	REED	FINALIZE/FILE PRELIMINARY OBJECTIONS TO JORDAN COMPLAINT.	1.1	\$764.50
08/30/22	REED	UPDATE CLIENT RE PO FILING.	0.2	\$139.00
TOTAL			6.5	\$3,035.50

TIMEKEEPER TIME SUMMARY:

Timekeeper	Hours
E. E. REED	1.3
S. OHNONA	5.2
TOTAL	6.5

TOTAL BALANCE DUE UPON RECEIPT \$3,035.50



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REMITTANCE PAGE

ALAN REDMOND
2 HIGH ROAD
WYOMISSING, PA 19610
alanredmond23@gmail.com

Invoice Number 3028960
Invoice Date 09/07/22
Client Number 185418
Matter Number 00008

RE: JORDAN V. BENE MARKET LLC

TOTAL BALANCE DUE UPON RECEIPT

\$3,035.50

PAYMENT INSTRUCTIONS

If you are currently remitting payment via check and have the ability to convert to an electronic payment format, please remit payment via ACH or WIRE using the instructions below. Thank you.

CHECK PAYMENT

Make Payable to Fox Rothschild LLP:
Fox Rothschild LLP
Attn: Accounts Receivable - 01
2000 Market Street, 20th Floor
Philadelphia, PA 19103-3222

ACH PAYMENT

Wells Fargo Bank
420 Montgomery Street
San Francisco, CA 94104
[REDACTED]
Account: Fox Rothschild LLP
[REDACTED]
Swift Code: #WFBIUS6S (international wires only)
Email: AR@foxrothschild.com

WIRE INSTRUCTIONS

Wells Fargo Bank
420 Montgomery Street
San Francisco, CA 94104
[REDACTED]
Account: Fox Rothschild LLP
[REDACTED]
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TAX I.D. NO. [REDACTED]

ALAN REDMOND
2 HIGH ROAD
WYOMISSING, PA 19610
alanredmond23@gmail.com

Invoice Number 3050292
Invoice Date 10/12/22
Client Number 185418
Matter Number 00008

RE: JORDAN V. BENE MARKET LLC

FOR PROFESSIONAL SERVICES RENDERED THROUGH 09/30/22:

Date	Timekeeper	Description	Hours	Amount
09/12/22	REED	REVISE FILINGS IN FOLLOW UP TO PRELIMINARY OBJECTIONS.	0.4	\$278.00
09/16/22	REED	CALLS WITH COURT RE PRELIMINARY OBJECTIONS TO COMPLAINT AND PREPARE/SUBMIT SUPPLEMENTAL ORDER.	2.3	\$1,598.50
TOTAL			2.7	\$1,876.50

TIMEKEEPER TIME SUMMARY:

Timekeeper	Hours
E. E. REED	2.7
TOTAL	2.7

TOTAL AMOUNT OF THIS INVOICE \$1,876.50

PRIOR BALANCE DUE \$3,035.50

TOTAL BALANCE DUE UPON RECEIPT \$4,912.00

OUTSTANDING INVOICES PRIOR TO 10/12/22

Invoice Date	Invoice #	Total
09/07/22	3028960	\$3,035.50
TOTAL PRIOR BALANCES DUE		\$3,035.50



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TAX I.D. NO. [REDACTED]

REMITTANCE PAGE

ALAN REDMOND
2 HIGH ROAD
WYOMISSING, PA 19610
alanredmond23@gmail.com

Invoice Number	3050292
Invoice Date	10/12/22
Client Number	185418
Matter Number	00008

RE: JORDAN V. BENE MARKET LLC

TOTAL AMOUNT OF THIS INVOICE	\$1,876.50
PRIOR BALANCE DUE	\$3,035.50
TOTAL BALANCE DUE UPON RECEIPT	<u>\$4,912.00</u>

PAYMENT INSTRUCTIONS

If you are currently remitting payment via check and have the ability to convert to an electronic payment format, please remit payment via ACH or WIRE using the instructions below. Thank you.

CHECK PAYMENT

Make Payable to Fox Rothschild LLP:
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2000 Market Street, 20th Floor
Philadelphia, PA 19103-3222

ACH PAYMENT

Wells Fargo Bank
420 Montgomery Street
San Francisco, CA 94104
[REDACTED]
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[REDACTED]
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Email: AR@foxrothschild.com

WIRE INSTRUCTIONS

Wells Fargo Bank
420 Montgomery Street
San Francisco, CA 94104
[REDACTED]
Account: Fox Rothschild LLP
[REDACTED]
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TAX I.D. NO. [REDACTED]

ALAN REDMOND
2 HIGH ROAD
WYOMISSING, PA 19610
alanredmond23@gmail.com

Invoice Number 3071579
Invoice Date 11/10/22
Client Number 185418
Matter Number 00008

RE: JORDAN V. BENE MARKET LLC

FOR PROFESSIONAL SERVICES RENDERED THROUGH 10/31/22:

Date	Timekeeper	Description	Hours	Amount
10/04/22	REED	COORDINATE HEARING OF PRELIMINARY OBJECTIONS WITH COURT.	0.2	\$139.00
TOTAL			0.2	\$139.00

TIMEKEEPER TIME SUMMARY:

Timekeeper	Hours
E. E. REED	0.2
TOTAL	0.2

TOTAL PROFESSIONAL SERVICES \$139.00

COSTS ADVANCED AND EXPENSES INCURRED:

Description	Amount
COURT FILINGS	\$16.00
TOTAL EXPENSES	\$16.00
TOTAL AMOUNT OF THIS INVOICE	\$155.00
PRIOR BALANCE DUE	\$4,912.00
TOTAL BALANCE DUE UPON RECEIPT	<u>\$5,067.00</u>

OUTSTANDING INVOICES PRIOR TO 11/10/22

Invoice Date	Invoice #	Total	Invoice Date	Invoice #	Total
09/07/22	3028960	\$3,035.50	10/12/22	3050292	\$1,876.50
TOTAL PRIOR BALANCES DUE					\$4,912.00



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REMITTANCE PAGE

ALAN REDMOND
2 HIGH ROAD
WYOMISSING, PA 19610
alanredmond23@gmail.com

Invoice Number	3071579
Invoice Date	11/10/22
Client Number	185418
Matter Number	00008

RE: JORDAN V. BENE MARKET LLC

TOTAL AMOUNT OF THIS INVOICE	\$155.00
PRIOR BALANCE DUE	\$4,912.00
TOTAL BALANCE DUE UPON RECEIPT	<u>\$5,067.00</u>

PAYMENT INSTRUCTIONS

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TAX I.D. NO. [REDACTED]

ALAN REDMOND
2 HIGH ROAD
WYOMISSING, PA 19610
alanredmond23@gmail.com

Invoice Number 3092203
Invoice Date 12/09/22
Client Number 185418
Matter Number 00008

RE: JORDAN V. BENE MARKET LLC

FOR PROFESSIONAL SERVICES RENDERED THROUGH 11/30/22:

Date	Timekeeper	Description	Hours	Amount
11/17/22	REED	REVIEW RULES AND CONSIDER RESPONSE TO MOTION FOR BOND.	0.6	\$417.00
11/28/22	REED	CALL WITH CLIENT RE CASE STATUS.	0.3	\$208.50
11/29/22	REED	PREPARE FOR ARGUMENT ON PRELIMINARY OBJECTIONS AND MOTION TO STAY.	5.3	\$3,683.50
11/30/22	REED	ARGUE MOTION FOR STAY AND PRELIMINARY OBJECTIONS.	3.4	\$2,363.00
TOTAL			9.6	\$6,672.00

TIMEKEEPER TIME SUMMARY:

Timekeeper	Hours
E. E. REED	9.6
TOTAL	9.6

TOTAL PROFESSIONAL SERVICES \$6,672.00

COSTS ADVANCED AND EXPENSES INCURRED:

Description	Amount
COURT FILINGS	\$16.00
TOTAL EXPENSES	\$16.00

TOTAL AMOUNT OF THIS INVOICE \$6,688.00

PRIOR BALANCE DUE \$5,067.00

TOTAL BALANCE DUE UPON RECEIPT \$11,755.00**OUTSTANDING INVOICES PRIOR TO 12/09/22**

Invoice Date	Invoice #	Total	Invoice Date	Invoice #	Total
09/07/22	3028960	\$3,035.50	11/10/22	3071579	\$155.00
10/12/22	3050292	\$1,876.50			
			TOTAL PRIOR BALANCES DUE		\$5,067.00



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TAX I.D. NO. [REDACTED]

REMITTANCE PAGE

ALAN REDMOND
2 HIGH ROAD
WYOMISSING, PA 19610
alanredmond23@gmail.com

Invoice Number	3092203
Invoice Date	12/09/22
Client Number	185418
Matter Number	00008

RE: JORDAN V. BENE MARKET LLC

TOTAL AMOUNT OF THIS INVOICE	\$6,688.00
PRIOR BALANCE DUE	\$5,067.00
TOTAL BALANCE DUE UPON RECEIPT	<u>\$11,755.00</u>

PAYMENT INSTRUCTIONS

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Philadelphia, PA 19103-3222

ACH PAYMENT

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420 Montgomery Street
San Francisco, CA 94104
[REDACTED]
Account: Fox Rothschild LLP
[REDACTED]
[REDACTED] (international wires only)
Email: AR@foxrothschild.com

WIRE INSTRUCTIONS

Wells Fargo Bank
420 Montgomery Street
San Francisco, CA 94104
[REDACTED]
Account: Fox Rothschild LLP
[REDACTED]
[REDACTED] (international wires only)

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TAX I.D. NO. [REDACTED]

ALAN REDMOND
2 HIGH ROAD
WYOMISSING, PA 19610
alanredmond23@gmail.com

Invoice Number 3102115
Invoice Date 01/06/23
Client Number 185418
Matter Number 00008

RE: JORDAN V. BENE MARKET LLC

FOR PROFESSIONAL SERVICES RENDERED THROUGH 12/31/22:

Date	Timekeeper	Description	Hours	Amount
12/03/22	REED	FOLLOW UP ON DISCOVERY ISSUES IN JORDAN V. REDMOND.	0.2	\$139.00
12/13/22	DOUGHERTY	EMAILS RE: DISCOVERY DEFICIENCIES WITH OPPOSING COUNSEL AND CLIENT	0.3	\$190.50
TOTAL			0.5	\$329.50

TIMEKEEPER TIME SUMMARY:

Timekeeper	Hours
C. DOUGHERTY	0.3
E. E. REED	0.2
TOTAL	0.5

TOTAL PROFESSIONAL SERVICES \$329.50

COSTS ADVANCED AND EXPENSES INCURRED:

Description	Amount
MILES - OUT-OF-TOWN TRAVEL EXPENSE	\$56.25
PARKING - OUT-OF-TOWN TRAVEL EXPENSE	\$4.45
TOTAL EXPENSES	\$60.70

TOTAL AMOUNT OF THIS INVOICE \$390.20

PRIOR BALANCE DUE \$11,755.00

TOTAL BALANCE DUE UPON RECEIPT \$12,145.20

OUTSTANDING INVOICES PRIOR TO 01/06/23

Invoice Date	Invoice #	Total	Invoice Date	Invoice #	Total
09/07/22	3028960	\$3,035.50	11/10/22	3071579	\$155.00
10/12/22	3050292	\$1,876.50	12/09/22	3092203	\$6,688.00
			TOTAL PRIOR BALANCES DUE		\$11,755.00



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TAX I.D. NO. [REDACTED]

REMITTANCE PAGE

ALAN REDMOND
2 HIGH ROAD
WYOMISSING, PA 19610
alanredmond23@gmail.com

Invoice Number	3102115
Invoice Date	01/06/23
Client Number	185418
Matter Number	00008

RE: JORDAN V. BENE MARKET LLC

TOTAL AMOUNT OF THIS INVOICE	\$390.20
PRIOR BALANCE DUE	\$11,755.00
TOTAL BALANCE DUE UPON RECEIPT	<u>\$12,145.20</u>

PAYMENT INSTRUCTIONS

If you are currently remitting payment via check and have the ability to convert to an electronic payment format, please remit payment via ACH or WIRE using the instructions below. Thank you.

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2000 Market Street, 20th Floor
Philadelphia, PA 19103-3222

ACH PAYMENT

Wells Fargo Bank
420 Montgomery Street
San Francisco, CA 94104
[REDACTED]
Account: Fox Rothschild LLP
[REDACTED]
[REDACTED] (international wires only)
Email: AR@foxrothschild.com

WIRE INSTRUCTIONS

Wells Fargo Bank
420 Montgomery Street
San Francisco, CA 94104
[REDACTED]
Account: Fox Rothschild LLP
[REDACTED]
[REDACTED] (international wires only)

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Fox Rothschild ^{LLP}
ATTORNEYS AT LAW

Dear Clients,

We would like to update you on our client invoice payment options. If you are currently making payment by check, **please note our preferred method of payment is ACH or Wire transfer.**

To pay by WIRE Transfer:

Wells Fargo Bank
420 Montgomery Street
San Francisco, CA 94104

[REDACTED] (for wires)

Account: Fox Rothschild LLP

[REDACTED]

Reference: ****Please reference client/matter number****

(Remittance to accounting.ar@foxrothschild.com)

If you prefer to send payment via ACH, please send an ACH enrollment form to Accounting.AR@Foxrothschild.com or remit using our ACH instructions below.

Wells Fargo Bank
420 Montgomery Street
San Francisco, CA 94104

[REDACTED]

Account: Fox Rothschild LLP

[REDACTED]

(international wires only)

Reference: ****Please reference client/matter number****

(Remittance to accounting.ar@foxrothschild.com)

Kindly update your records accordingly if you can revise your payment method. If you have any questions, please contact the Accounts Receivable group at Accounting.AR@Foxrothschild.com or 215-299-2000.

We appreciate your assistance and extend our gratitude for your ongoing business.



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TAX I.D. NO. [REDACTED]

ALAN REDMOND
2 HIGH ROAD
WYOMISSING, PA 19610
alanredmond23@gmail.com

Invoice Number 3124394
Invoice Date 02/07/23
Client Number 185418
Matter Number 00008

RE: JORDAN V. BENE MARKET LLC

FOR PROFESSIONAL SERVICES RENDERED THROUGH 01/31/23:

Date	Timekeeper	Description	Hours	Amount
01/03/23	REED	FOLLOW UP WITH ORDER RESOLVING PRELIMINARY OBJECTIONS.	0.6	\$417.00
01/10/23	REED	CHECK DOCKET AND FOLLOW UP WITH COUNSEL ON PRELIMINARY OBJECTION STIPULATION.	0.3	\$208.50
01/13/23	REED	CALL WITH COURT RE ARGUMENT ON PRELIMINARY OBJECTIONS.	0.3	\$208.50
01/31/23	REED	PREPARE ANSWER TO COMPLAINT.	4.1	\$2,849.50
TOTAL			5.3	\$3,683.50

TIMEKEEPER TIME SUMMARY:

Timekeeper	Hours
E. E. REED	5.3
TOTAL	5.3

TOTAL AMOUNT OF THIS INVOICE \$3,683.50

PRIOR BALANCE DUE \$9,109.70

TOTAL BALANCE DUE UPON RECEIPT \$12,793.20

OUTSTANDING INVOICES PRIOR TO 02/07/23

Invoice Date	Invoice #	Total	Invoice Date	Invoice #	Total
10/12/22	3050292	\$1,876.50	12/09/22	3092203	\$6,688.00
11/10/22	3071579	\$155.00	01/06/23	3102115	\$390.20
TOTAL PRIOR BALANCES DUE					\$9,109.70



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TAX I.D. NO. [REDACTED]

REMITTANCE PAGE

ALAN REDMOND
2 HIGH ROAD
WYOMISSING, PA 19610
alanredmond23@gmail.com

Invoice Number	3124394
Invoice Date	02/07/23
Client Number	185418
Matter Number	00008

RE: JORDAN V. BENE MARKET LLC

TOTAL AMOUNT OF THIS INVOICE	\$3,683.50
PRIOR BALANCE DUE	\$9,109.70
TOTAL BALANCE DUE UPON RECEIPT	<u>\$12,793.20</u>

PAYMENT INSTRUCTIONS

If you are currently remitting payment via check and have the ability to convert to an electronic payment format, please remit payment via ACH or WIRE using the instructions below. Thank you.

CHECK PAYMENT

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ACH PAYMENT

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420 Montgomery Street
San Francisco, CA 94104
[REDACTED]
Account: Fox Rothschild LLP
[REDACTED]
[REDACTED] (international wires only)
Email: AR@foxrothschild.com

WIRE INSTRUCTIONS

Wells Fargo Bank
420 Montgomery Street
San Francisco, CA 94104
[REDACTED]
Account: Fox Rothschild LLP
[REDACTED]
[REDACTED] (international wires only)

Please include the Client, Matter, or Invoice Number with all payments.



Dear Clients,

As we approach our **March 31st** fiscal year-end, we request that you remit payments to us immediately to meet our year-end deadline.

Please send payment via ACH/Wire using our instructions below.

Wells Fargo Bank
420 Montgomery Street
San Francisco, CA 94104
Account: Fox Rothschild LLP

[REDACTED]
(Int'l wires only)
(Remittance to accounting.ar@foxrothschild.com)

For ACH enrollment, please contact your bank.

If you send us check payments via mail, kindly remit payment via overnight mail to assist in ensuring that your payment is received and posted for our fiscal year-end.

*As a courtesy, payments over **\$5,000** can be sent via FedEx Priority Overnight using our account [REDACTED] and sent to:*

Justine Botial
Fox Rothschild LLP
2000 Market Street – 20th Floor
Philadelphia, PA 19103-3222

If you have any questions, please contact the Accounts Receivable group at Accounting.AR@Foxrothschild.com or 215-299-2000.

We appreciate your assistance and extend our gratitude for your ongoing business.



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TAX I.D. NO. [REDACTED]

ALAN REDMOND
2 HIGH ROAD
WYOMISSING, PA 19610
alanredmond23@gmail.com

Invoice Number 3145864
Invoice Date 03/08/23
Client Number 185418
Matter Number 00008

RE: JORDAN V. BENE MARKET LLC

FOR PROFESSIONAL SERVICES RENDERED THROUGH 02/28/23:

Date	Timekeeper	Description	Hours	Amount
02/01/23	REED	CONTINUE PREPARATION OF ANSWER TO JORDAN COMPLAINT, SYNC WITH PRIOR TRIAL FINDINGS, AND ADDRESS WITH CLIENT.	2.2	\$1,529.00
02/02/23	REED	ADDRESS/INCORPORATE FEEDBACK ON ANSWER TO COMPLAINT.	0.2	\$139.00
02/03/23	REED	REVISE ANSWER TO ADDRESS TIME BAR ISSUES AND CHECK DEPOSITION CITATIONS AGAINST TRANSCRIPT.	0.9	\$625.50
02/10/23	REED	REVIEW AND CONSIDER/RESEARCH RESPONSE TO PETITION TO APPOINT RECEIVER; OUTLINE OPPOSITION.	2.9	\$2,015.50
02/14/23	REED	ADDRESS RECEIVER MOTION FILED IN PRIOR CASE.	1.6	\$1,112.00
02/15/23	REED	WRITE CLIENT AND CALL COURT RE SHOW-CAUSE ORDER ON RECEIVER MOTION.	0.3	\$208.50
02/21/23	REED	CALL WITH COURT RE RULE RETURNABLE RESCHEDULING.	0.2	\$139.00
02/27/23	REED	REVIEW AND UPDATE CLIENT RE PETITION FOR RECEIVER.	0.2	\$139.00
TOTAL			8.5	\$5,907.50

TIMEKEEPER TIME SUMMARY:

Timekeeper	Hours
E. E. REED	8.5
TOTAL	8.5

TOTAL AMOUNT OF THIS INVOICE \$5,907.50

PRIOR BALANCE DUE \$10,916.70

TOTAL BALANCE DUE UPON RECEIPT \$16,824.20

OUTSTANDING INVOICES PRIOR TO 03/08/23

Invoice Date	Invoice #	Total	Invoice Date	Invoice #	Total
11/10/22	3071579	\$155.00	01/06/23	3102115	\$390.20
12/09/22	3092203	\$6,688.00	02/07/23	3124394	\$3,683.50
			TOTAL PRIOR BALANCES DUE		\$10,916.70



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REMITTANCE PAGE

ALAN REDMOND
2 HIGH ROAD
WYOMISSING, PA 19610
alanredmond23@gmail.com

Invoice Number	3145864
Invoice Date	03/08/23
Client Number	185418
Matter Number	00008

RE: JORDAN V. BENE MARKET LLC

TOTAL AMOUNT OF THIS INVOICE	\$5,907.50
PRIOR BALANCE DUE	\$10,916.70
TOTAL BALANCE DUE UPON RECEIPT	<u>\$16,824.20</u>

PAYMENT INSTRUCTIONS

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[REDACTED]
[REDACTED]
Email: AR@foxrothschild.com

WIRE INSTRUCTIONS

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420 Montgomery Street
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[REDACTED]
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Fox Rothschild ^{LLP}
ATTORNEYS AT LAW

Dear Clients,

We would like to update you on our client invoice payment options. If you are currently making payment by check, **please note our preferred method of payment is ACH or Wire transfer.**

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[REDACTED]
Account: Fox Rothschild LLP

[REDACTED] (international wires only)

Reference: ****Please reference client/matter number****

(Remittance to accounting.ar@foxrothschild.com)

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Wells Fargo Bank
420 Montgomery Street
San Francisco, CA 94104
ACH #031000503 (for ACH payments)

Account: Fox Rothschild LLP

[REDACTED]
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Fox Rothschild LLP
ATTORNEYS AT LAW

2000 Market Street, 20th Floor Philadelphia, PA 19103-3222
Tel 215.299.2000 Fax 215.299.2150 www.foxrothschild.com

TAX I.D. NO. [REDACTED]

ALAN REDMOND
2 HIGH ROAD
WYOMISSING, PA 19610
alanredmond23@gmail.com

Invoice Number 3167168
Invoice Date 04/20/23
Client Number 185418
Matter Number 00008

RE: JORDAN V. BENE MARKET LLC

FOR PROFESSIONAL SERVICES RENDERED THROUGH 03/31/23:

Date	Timekeeper	Description	Hours	Amount
03/07/23	REED	REVIEW, CALENDAR, AND CIRCULATE DISCOVERY FROM JORDAN.	1.1	\$764.50
03/08/23	REED	PREPARE OPPOSITION TO MOTION FOR RECEIVER.	2.5	\$1,737.50
03/09/23	REED	FINALIZE/FILE OPPOSITION TO MOTION TO APPOINT A RECEIVER.	3.5	\$2,432.50
03/13/23	REED	APPEAR FOR HEARING ON RECEIVER MOTION.	4.2	\$2,919.00
03/22/23	REED	REVIEW/ADDRESS JORDAN'S REPLY IN SUPPORT OF THE RECEIVER MOTION AND REVIEW CITED CASES.	0.6	\$417.00
TOTAL			11.9	\$8,270.50

TIMEKEEPER TIME SUMMARY:

Timekeeper	Hours
E. E. REED	11.9
TOTAL	11.9

TOTAL PROFESSIONAL SERVICES \$8,270.50

COSTS ADVANCED AND EXPENSES INCURRED:

Description	Amount
COURT FILINGS	\$8.00
MILES - OUT-OF-TOWN TRAVEL EXPENSE	\$58.95
PARKING - LOCAL TRAVEL EXPENSE	\$34.00
TOTAL EXPENSES	<u>\$100.95</u>
TOTAL AMOUNT OF THIS INVOICE	\$8,371.45
PRIOR BALANCE DUE	\$16,669.20
TOTAL BALANCE DUE UPON RECEIPT	<u>\$25,040.65</u>

OUTSTANDING INVOICES PRIOR TO 04/20/23

Invoice Date	Invoice #	Total	Invoice Date	Invoice #	Total
12/09/22	3092203	\$6,688.00	02/07/23	3124394	\$3,683.50
01/06/23	3102115	\$390.20	03/08/23	3145864	\$5,907.50
			TOTAL PRIOR BALANCES DUE		\$16,669.20



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REMITTANCE PAGE

ALAN REDMOND
2 HIGH ROAD
WYOMISSING, PA 19610
alanredmond23@gmail.com

Invoice Number	3167168
Invoice Date	04/20/23
Client Number	185418
Matter Number	00008

RE: JORDAN V. BENE MARKET LLC

TOTAL AMOUNT OF THIS INVOICE	\$8,371.45
PRIOR BALANCE DUE	\$16,669.20
TOTAL BALANCE DUE UPON RECEIPT	<u>\$25,040.65</u>

PAYMENT INSTRUCTIONS

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TAX I.D. NO. [REDACTED]

ALAN REDMOND
2 HIGH ROAD
WYOMISSING, PA 19610
alanredmond23@gmail.com

Invoice Number 3176138
Invoice Date 05/08/23
Client Number 185418
Matter Number 00008

RE: JORDAN V. BENE MARKET LLC

FOR PROFESSIONAL SERVICES RENDERED THROUGH 04/30/23:

Date	Timekeeper	Description	Hours	Amount
04/03/23	REED	ADDRESS RESPONSES TO DISCOVERY.	0.2	\$139.00
04/04/23	REED	REVIEW/REVISE ANSWERS TO DISCOVERY REQUESTS.	2.7	\$1,876.50
04/05/23	REED	FOLLOW UP ON DISCOVERY ISSUES.	0.4	\$278.00
04/06/23	REED	REVIEW UPDATED DRAFT OF DISCOVERY ANSWERS.	0.7	\$486.50
04/07/23	REED	REVIEW FINANCIALS AND OTHER DOCUMENTS FOR PRODUCTION.	0.8	\$556.00
04/10/23	REED	CALL WITH CLIENT RE DISCOVERY RESPONSES AND NEXT STEPS; REVIEW/REVISE CURRENT DRAFT OF DISCOVERY RESPONSES.	1.2	\$834.00
04/11/23	REED	FOLLOW UP WITH SARDELLA RE HEARING.	0.2	\$139.00
04/11/23	REED	COORDINATE SARDELLA TESTIMONY WITH COUNSEL FOR ACCOUNTANT.	0.3	\$208.50
04/12/23	REED	CALL WITH CLIENT RE CASE STATUS AND STRATEGY.	1.2	\$834.00
04/12/23	REED	CALL WITH SARDELLA RE TESTIMONY AND FOLLOW UP WITH VALZ.	1.2	\$834.00
04/13/23	REED	COORDINATE TESTIMONY AND HEARING PREPARATION ON RECEIVER MOTION.	0.9	\$625.50
04/14/23	REED	ADDRESS RESPONSE TO NOTICE TO ATTEND, OBJECTIONS FROM JORDAN, 5TH, AND OTHER HEARING PREP ISSUES.	2.1	\$1,459.50
04/17/23	OHNONA	PERFORM FOLLOW UP RESEARCH RE:	2.4	\$984.00

Date	Timekeeper	Description	Hours	Amount
		POSTING BOND FOR RECEIVERSHIP		
04/17/23	REED	ADDRESS HEARING PREPARATION ISSUES.	1.2	\$834.00
04/18/23	REED	ADDRESS ACCOUNTANT TESTIMONY, ALAN ATTENDANCE, POTENTIAL RESOLUTION OF RECEIVER ISSUE.	1.4	\$973.00
04/19/23	REED	ADDRESS HEARING SCHEDULING ISSUES WITH OPPOSING COUNSEL.	0.3	\$208.50
04/20/23	REED	ADDRESS RECEIVER HEARING/NOTICE TO ATTEND ISSUES.	0.5	\$347.50
04/25/23	REED	ASSIST WITH DISCOVERY TO JORDAN.	0.3	\$208.50
04/27/23	REED	ADDRESS POTENTIAL AFFIDAVIT FROM ACCOUNTANT.	0.4	\$278.00
04/27/23	REED	REVIEW / COMMENT ON DRAFTS OF DISCOVERY TO JORDAN.	0.6	\$417.00
04/28/23	REED	REVIEW/REVISE DISCOVERY REQUESTS.	0.8	\$556.00
		TOTAL	19.8	\$13,077.00

TIMEKEEPER TIME SUMMARY:

Timekeeper	Hours
E. E. REED	17.4
S. OHNONA	2.4
TOTAL	19.8

TOTAL PROFESSIONAL SERVICES \$13,077.00

COSTS ADVANCED AND EXPENSES INCURRED:

Description	Amount
COURT FILINGS	\$8.00
WESTLAW, RESEARCH	\$2.28
TOTAL EXPENSES	\$10.28
TOTAL AMOUNT OF THIS INVOICE	\$13,087.28
PRIOR BALANCE DUE	\$25,040.65
TOTAL BALANCE DUE UPON RECEIPT	<u>\$38,127.93</u>

OUTSTANDING INVOICES PRIOR TO 05/08/23

Invoice Date	Invoice #	Total	Invoice Date	Invoice #	Total
12/09/22	3092203	\$6,688.00	03/08/23	3145864	\$5,907.50
01/06/23	3102115	\$390.20	04/20/23	3167168	\$8,371.45
02/07/23	3124394	\$3,683.50			
			TOTAL PRIOR BALANCES DUE		\$25,040.65



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REMITTANCE PAGE

ALAN REDMOND
2 HIGH ROAD
WYOMISSING, PA 19610
alanredmond23@gmail.com

Invoice Number	3176138
Invoice Date	05/08/23
Client Number	185418
Matter Number	00008

RE: JORDAN V. BENE MARKET LLC

TOTAL AMOUNT OF THIS INVOICE	\$13,087.28
PRIOR BALANCE DUE	\$25,040.65
TOTAL BALANCE DUE UPON RECEIPT	<u>\$38,127.93</u>

PAYMENT INSTRUCTIONS

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Email: AR@foxrothschild.com

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TAX I.D. NO. [REDACTED]

ALAN REDMOND
2 HIGH ROAD
WYOMISSING, PA 19610
alanredmond23@gmail.com

Invoice Number 3190581
Invoice Date 06/06/23
Client Number 185418
Matter Number 00008

RE: JORDAN V. BENE MARKET LLC

FOR PROFESSIONAL SERVICES RENDERED THROUGH 05/31/23:

Date	Timekeeper	Description	Hours	Amount
05/08/23	REED	CALLS WITH CLIENT RE LAWSUIT AND RELATED REGULATORY ISSUES.	0.4	\$278.00
05/10/23	REED	PREPARE AFFIDAVIT FOR ACCOUNTANT.	0.4	\$278.00
05/11/23	REED	PREPARE/CIRCULATE SARDELLA AFFIDAVIT.	0.7	\$486.50
05/12/23	REED	REVISE AND ROUTE AFFIDAVIT TO SARDELLA.	0.4	\$278.00
05/13/23	REED	FOLLOW UP ON AFFIDAVIT FOR RECEIVER HEARING.	0.2	\$139.00
05/15/23	REED	FILE AFFIDAVIT AND PREPARE AND FILE SUPPLEMENT TO COURT REGARDING UPCOMING HEARING.	2.5	\$1,737.50
05/16/23	REED	CALL WITH COURT RE HEARING AND FOLLOW UP FOR HEARING PREP.	3.3	\$2,293.50
05/17/23	REED	APPEAR FOR HEARING ON MOTION TO APPOINT RECEIVER.	5.2	\$3,614.00
05/30/23	REED	PREPARE SUPPLEMENTAL BRIEF ON SUCCESSOR LIABILITY ISSUE.	1.1	\$764.50
05/31/23	REED	PREPARE AND FILE RESPONSE TO JORDAN SUPPLEMENTAL BRIEF ON SUCCESSOR LIABILITY ISSUE.	1.3	\$903.50
TOTAL			15.5	\$10,772.50

TIMEKEEPER TIME SUMMARY:

Timekeeper	Hours
E. E. REED	15.5
TOTAL	15.5

TOTAL PROFESSIONAL SERVICES \$10,772.50

COSTS ADVANCED AND EXPENSES INCURRED:

Description	Amount
MILES - OUT-OF-TOWN TRAVEL EXPENSE	\$77.29
PARKING - OUT-OF-TOWN TRAVEL EXPENSE	\$15.00

TOTAL EXPENSES \$92.29

TOTAL AMOUNT OF THIS INVOICE \$10,864.79

PRIOR BALANCE DUE \$38,127.93

TOTAL BALANCE DUE UPON RECEIPT \$48,992.72

OUTSTANDING INVOICES PRIOR TO 06/06/23

Invoice Date	Invoice #	Total	Invoice Date	Invoice #	Total
12/09/22	3092203	\$6,688.00	03/08/23	3145864	\$5,907.50
01/06/23	3102115	\$390.20	04/20/23	3167168	\$8,371.45
02/07/23	3124394	\$3,683.50	05/08/23	3176138	\$13,087.28
			TOTAL PRIOR BALANCES DUE		\$38,127.93



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REMITTANCE PAGE

ALAN REDMOND
2 HIGH ROAD
WYOMISSING, PA 19610
alanredmond23@gmail.com

Invoice Number	3190581
Invoice Date	06/06/23
Client Number	185418
Matter Number	00008

RE: JORDAN V. BENE MARKET LLC

TOTAL AMOUNT OF THIS INVOICE	\$10,864.79
PRIOR BALANCE DUE	\$38,127.93
TOTAL BALANCE DUE UPON RECEIPT	<u>\$48,992.72</u>

PAYMENT INSTRUCTIONS

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[REDACTED]
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[REDACTED] (international wires only)
Email: AR@foxrothschild.com

WIRE INSTRUCTIONS

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[REDACTED]
[REDACTED]
Account: Fox Rothschild LLP
[REDACTED]
[REDACTED] (international wires only)

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ATTORNEYS AT LAW

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Account: Fox Rothschild LLP

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Account: Fox Rothschild LLP

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Reference: ****Please reference client/matter number****

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TAX I.D. NO. [REDACTED]

ALAN REDMOND
2 HIGH ROAD
WYOMISSING, PA 19610
alanredmond23@gmail.com

Invoice Number 3207557
Invoice Date 07/06/23
Client Number 185418
Matter Number 00008

RE: JORDAN V. BENE MARKET LLC

FOR PROFESSIONAL SERVICES RENDERED THROUGH 06/30/23:

Date	Timekeeper	Description	Hours	Amount
06/07/23	REED	COURT CALL RE RECEIVER ISSUE AND FOLLOW UP WITH CLIENT.	1.3	\$981.50
06/08/23	REED	REVIEW ORDER APPOINTING RECEIVER AND WRITE CLIENT RE SAME.	0.4	\$302.00
06/09/23	REED	CALLS WITH CLIENT AND LEGAL TEAM ON RECEIVER AND FOLLOW UP ON TRANSCRIPT.	1.3	\$981.50
06/19/23	REED	REVIEW/ADDRESS ORDER VACATING RECEIVER ORDER.	0.4	\$302.00
TOTAL			3.4	\$2,567.00

TIMEKEEPER TIME SUMMARY:

Timekeeper	Hours
E. E. REED	3.4
TOTAL	3.4

TOTAL PROFESSIONAL SERVICES \$2,567.00

COSTS ADVANCED AND EXPENSES INCURRED:

Description	Amount
COURT FILINGS	\$16.00
DEPOSITION/TRANSCRIPT	\$115.00
MESSENGER SERVICE/FEDERAL EXPRESS	\$17.31
MILES - OUT-OF-TOWN TRAVEL EXPENSE	\$131.00
PARKING - OUT-OF-TOWN TRAVEL EXPENSE	\$30.00
TOLLS - OUT-OF-TOWN TRAVEL EXPENSE	\$18.60
TOTAL EXPENSES	<u>\$327.91</u>
TOTAL AMOUNT OF THIS INVOICE	\$2,894.91
PRIOR BALANCE DUE	\$41,914.52
TOTAL BALANCE DUE UPON RECEIPT	<u>\$44,809.43</u>

OUTSTANDING INVOICES PRIOR TO 07/06/23

Invoice Date	Invoice #	Total	Invoice Date	Invoice #	Total
02/07/23	3124394	\$3,683.50	05/08/23	3176138	\$13,087.28
03/08/23	3145864	\$5,907.50	06/06/23	3190581	\$10,864.79
04/20/23	3167168	\$8,371.45			
			TOTAL PRIOR BALANCES DUE		\$41,914.52



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REMITTANCE PAGE

ALAN REDMOND
2 HIGH ROAD
WYOMISSING, PA 19610
alanredmond23@gmail.com

Invoice Number	3207557
Invoice Date	07/06/23
Client Number	185418
Matter Number	00008

RE: JORDAN V. BENE MARKET LLC

TOTAL AMOUNT OF THIS INVOICE	\$2,894.91
PRIOR BALANCE DUE	\$41,914.52
TOTAL BALANCE DUE UPON RECEIPT	<u>\$44,809.43</u>

PAYMENT INSTRUCTIONS

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Fox Rothschild ^{LLP}
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San Francisco, CA 94104



Reference: ****Please reference client/matter number****
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420 Montgomery Street
San Francisco, CA 94104

 (for ACH payments)

Account: Fox Rothschild LLP



Reference: ****Please reference client/matter number****
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TAX I.D. NO. [REDACTED]

ALAN REDMOND
2 HIGH ROAD
WYOMISSING, PA 19610
alanredmond23@gmail.com

Invoice Number 3230654
Invoice Date 08/07/23
Client Number 185418
Matter Number 00008

RE: JORDAN V. BENE MARKET LLC

FOR PROFESSIONAL SERVICES RENDERED THROUGH 07/31/23:

TOTAL PROFESSIONAL SERVICES \$0.00

COSTS ADVANCED AND EXPENSES INCURRED:

Description	Amount
COURT FILINGS	\$8.00
DEPOSITION/TRANSCRIPT	\$112.50
TOTAL EXPENSES	<u>\$120.50</u>
TOTAL AMOUNT OF THIS INVOICE	\$120.50
PRIOR BALANCE DUE	\$44,809.43
TOTAL BALANCE DUE UPON RECEIPT	<u>\$44,929.93</u>

OUTSTANDING INVOICES PRIOR TO 08/07/23

Invoice Date	Invoice #	Total	Invoice Date	Invoice #	Total
02/07/23	3124394	\$3,683.50	05/08/23	3176138	\$13,087.28
03/08/23	3145864	\$5,907.50	06/06/23	3190581	\$10,864.79
04/20/23	3167168	\$8,371.45	07/06/23	3207557	\$2,894.91
			TOTAL PRIOR BALANCES DUE		\$44,809.43



Fox Rothschild LLP
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REMITTANCE PAGE

ALAN REDMOND
2 HIGH ROAD
WYOMISSING, PA 19610
alanredmond23@gmail.com

Invoice Number	3230654
Invoice Date	08/07/23
Client Number	185418
Matter Number	00008

RE: JORDAN V. BENE MARKET LLC

TOTAL AMOUNT OF THIS INVOICE	\$120.50
PRIOR BALANCE DUE	\$44,809.43
TOTAL BALANCE DUE UPON RECEIPT	<u>\$44,929.93</u>

PAYMENT INSTRUCTIONS

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[REDACTED]
[REDACTED] (international wires only)

Please include the Client, Matter, or Invoice Number with all payments.

Exhibit “F”

RUSH LAW GROUP

38 N. 6th Street
P.O. Box 0758
Reading, PA 19603-0758
Telephone: 610-413-5337
Fax: 610-927-6219
www.rushlawberks.com
wrush@rushlawberks.com

July 10, 2024

Alan C. Redmond
Re: Bene Market
alanredmond23@gmail.com

Re:

Jordan v. Bene Market, LLC, Berks County CCP Docket No. 22-11757
In Re: National Brokers of America, Inc., Bankruptcy No. 19-15488

Billing Rate: \$400.00/Hour

CLIENT	DATE	TIME	DESCRIPTION
Bene Market and NBOA, Inc. (Redmond)	March 22, 2024	5.5 Hours	Mtg w/ Redmond ; briefed on Bene Market (docket 22-11757). Reviewed filings. Cross-referenced NBOA Berks Docket issues. Raised issue of Bankruptcy stay violation? Additional research to follow.
Bene Market and NBOA, Inc. (Redmond)	March 27, 2024 through May 4, 2024	11.2 Hours	Review bankruptcy docket and filings, brief research into stay violations. Cross-reference with current cases against precedent. -17 tele cons with Redmond on subject. -12 emails w/ client re: issue of stay violation.
Bene Market and NBOA, Inc. (Redmond)	May 5, 2024	6.3 Hours	Meet w/ Attorneys and Redmond. Discussed Bankruptcy filings and belief stay was violated by Jordan through Bene Market state matter. Begin draft of bankruptcy petition along with additional research.
Bene Market and NBOA, Inc. (Redmond)	May 18 to 21, 2024	8.4 Hours	Research and complete draft of Petition before bankruptcy court.

Bene Market and NBOA, Inc. (Redmond)	May 21 to May 23, 2024	2.5 Hours	Revise and circulate final draft to Attorneys for filing.
Bene Market and NBOA, Inc. (Redmond)	June 25, 2024	2.0 Hours	Final preparation with attorneys for Bankruptcy Ct. argument.
		TOTAL HOURS:	35.9 Hours/\$400/hour (\$14,360.00)

BILLING INVOICE

Legal Fees (March 22, 2024 to June 25, 2024): **\$14,360.00**

- Time Sheet Attached

Legal Fees Due: \$14,360.00
Legal Fees Paid: \$0.00
Filing/Service Fees: N/A
Due Date: **UPON RECEIPT**

Total Due: \$14,360.00

RETURN PAYMENT TO:

**Rush Law Group, LLC
PO Box 758
Reading, PA 19603**

*Checks should be made payable to Rush Law Group
Credit Card payments may be phoned in or paid online*

Exhibit “G”

July 2, 2024

National Brokers of America, INC.,
and Alan Christopher Redmond
2 High Road Wyomissing, PA 19610

**RE: In re:
National Brokers of America, Inc.
Bankruptcy No. 19-15488-pmm**

Labor:

6/25/2024	OSD	Discussion of Bankruptcy Motion with Attorney Valz and Attorney Heim 0.5 hour
6/25/2024	OSD	Review of <u>In Re Heckman</u> – Judge Fehling Opinion; Berks County Bar Journal 0.5 hour
6/27/2024	OSD	Meeting with client and counsel re: Motion to Intervene 0.2 hour
7/1/2024	OSD	Review of pleadings 0.5 hour
7/1/2024	OSD	Phone call with Attorney Norman Valz and Attorney David Heim re: strategy for 7/2/2024 Motion Argument. 0.5 hour
7/1/2024	OSD	Entry of Appearance; Emails to Attorney Valz re: same 0.2 hour
7/2/2024	OSD	Travel to/from U.S. Courthouse Gateway Building 0.4 hour
7/2/2024	OSD	Meeting at Courtroom with Attorney Norman Valz 0.3 hour
7/2/2024	OSD	Attend Hearing to provide support to Attorney Valz and Attorney Heim 1.5 hour

Billing Summary

Total time OSD: 4.6 hour @\$250/hr
Total Hourly fees of OSD: \$1,150.00

Total Due..... \$1,150.00
Payment Due Date..... Upon Receipt

THANK YOU FOR USING DEMING LAW OFFICE, LLC FOR YOUR LEGAL NEEDS